

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**IRADA AKHOUNDOVA,**

**Defendant.**

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**Criminal No. 4:24-cr-221**

**DEFENDANT IRADA AKHOUNDOVA'S UNOPPOSED MOTION  
FOR TEMPORARY MODIFICATION OF CONDITIONS OF RELEASE**

The Defendant, Irada Akhoundova, by and through undersigned counsel, respectfully moves for an Order temporarily modifying her conditions of release. In support of her Motion, the Defendant states as follows:

1. Ms. Akhoundova pled guilty to Count One of the Information on May 1, 2024. She is currently released on conditions that include certain travel restrictions and the surrender of her passport to pre-trial services.
2. Ms. Akhoundova respectfully requests the temporary modification of those conditions to allow her to travel internationally with her husband, her child, and other members of her family between July 23, 2024 and September 5, 2024. For the continued safety and security of Ms. Akhoundova and her family, undersigned counsel has shared the specific itinerary confidentially with the Government and with pre-trial services, and will provide that information *in camera* to the Court, should the Court request it.

3. Opposing counsel has been fully briefed about this travel and has no objection to Ms. Akhoundova's request.
4. Pre-Trial Services has been fully briefed about this travel, to include the receipt of a specific itinerary and proof of purchase of airline tickets, and has no objection to Ms. Akhoundova's request.

Accordingly, Ms. Akhoundova respectfully requests the Court order that (1) Ms. Akhoundova's conditions of release be modified to permit her to travel internationally as set forth in the itinerary confidentially provided to pre-trial services; and (2) Ms. Akhoundova be authorized to retrieve her U.S. passport from pre-trial services in advance of her travel on July 23, 2024, to be returned to pre-trial services upon her return to Houston no later than September 5, 2024. A proposed order is attached for the Court's convenience.

Pursuant to LR5.2 and CrLR49, Ms. Akhoundova respectfully advises the Court that this case is related to *United States v. Cuellar, et al.*, No. 4:24-cr-224 (SDTX).

Respectfully submitted,

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**Certificate of Service**

I hereby certify that on July 10, 2024, I caused to have electronically filed the foregoing with the Clerk of Court for the Southern District of Texas using the CM/ECF System, which will send notification of such filing to all parties or counsel of record.

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**Certificate of Conference**

I hereby certify that on July 9, 2024, counsel for the United States was contacted to obtain the Government's position on this motion. Counsel for the Government stated that the Government does not object to Ms. Akhoundova's motion.

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